

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A TROUT  
POINT LODGE LTD OF NOVA SCOTIA  
& IN THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, TORSTAR  
CORPORATION, NATIONAL  
GEOGRAPHIC SOCIETY, ASHOKA, XYZ  
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

**CHARLES LEARY'S MOTION FOR ADDITIONAL TIME  
TO FILE A RESPONSE TO HANDSHOE'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

---

WHEREAS Defendant/Plaintiff by Counterclaim has *never received* notice of Plaintiff Handshoe's Motion for Partial Summary judgment by post or any other means, and has just become aware that such a motion was filed; AND Dr. Leary is currently working in Europe, Dr. Leary respectfully requests an ADDITIONAL 14 DAY PERIOD to file his OPPOSITION to Handshoe's motion.

Defendant Leary is currently working in Western Europe. Dr. Leary has employed a service to receive and immediately scan and email all postal service mail received in Canada. As of today's date Dr. Leary has not received notice of Mr. Handshoe's Motion for Partial Summary judgment. Dr. Leary opposes Mr. Handshoe's motion, but has only just learned the motion was filed, and requires time to respond, including reviewing evidence. Mr. Handshoe only sends copies of items he files with the Court by email when it suits his purposes, and he has not communicated with Dr. Leary about this motion. Dr. Leary is mailing this instant motion by rapid means to the Court on today's date.

THEREFORE, Dr. Leary respectfully requests that the Court grant this, his motion for an additional 14 (fourteen) days time to file a response.

Signed this 10<sup>th</sup> day of April, 2018.

A handwritten signature in blue ink that reads "Charles L. Leary".

Charles L. Leary

**CERTIFICATE OF SERVICE**

I, Charles Leary, defendant and plaintiff by counterclaim, hereby certify that I have this date filed the foregoing with the Clerk of the Court via postal channels, and that the ECF system will send notification of such filing to the following:

Douglas Handshoe  
Post Office Box 788  
110 Hall Street  
Wiggins, MS 39577

***Pro Se Plaintiff/Defendant by counterclaim***

So certified, this 10<sup>th</sup> day of April, 2018.

  
Charles L. Leary

